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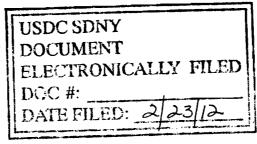
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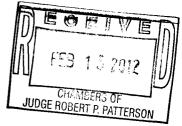
Michael H. Bernstein 212-898-4011 michael.bernstein@sdma.com

February 15, 2012

Via Facsimile (212) 805-7917

Hon. Robert P. Patterson, Jr., U.S.D.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312





Re: Michael Cacoperdo v. Hartford Life Insurance Company

Civ. Act. No. 10-civ-07847 (RPP) SDMA File No.: 02489-000101

Dear Judge Patterson:

This office represents the defendant Hartford Life Insurance Company ("Hartford") in the above-referenced matter. We write to request a two-week extension of time to complete discovery from March 30, 2012 to April 13, 2012, and a corresponding extension of time for the remaining schedule in this matter as outlined below.

This is the second request for an extension of time to complete discovery since the filing of the Stipulated Amended Scheduling Order (Doc. No. 53). The reason for this request is that Plaintiff has requested that Hartford produce Appeal Specialist Juan Mendez for a deposition. Juan Mendez is located in Maitland, Florida. Plaintiff and Hartford's counsel have been working together to schedule the deposition of Juan Mendez around another deposition in this matter, in addition to various vacation schedules, and have agreed on April 4, 2012, which is after the current deadline for the completion of discovery. The extension is expected to provide sufficient time to complete all depositions and any remaining discovery relating thereto.

Plaintiff consents to the extension of time and to the following discovery schedule:

Description	Original Date	Proposed Amended Date
Discovery Completion Date	3/30/2012	4/13/2012
Dispositive Motions Due	4/13/2012	4/27/2012
Trial date is scheduled For	6/13/2012	6/27/2012

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Thank you for your consideration of this matter

Respectfully submifted,

Michael H. Bernstein

Sedgwick LLP

Jason A. Newfield, Esq. (via facsimile) cc:

Attorneys for Plaintiff